

## EXHIBIT C

### **X. PLAINTIFF'S REVISED EXHIBIT LIST**

Plaintiff submits its list of exhibits for its case in chief, excluding exhibits that may be used for cross examination or rebuttal. Plaintiff reserves the right to use any exhibit offered by Defendants.

Exhibit Number	Description	Prior ID/Bates Range	Objections	Basis for Objection
P001	Silver sample of AFN-5013R-4		X	Not genuine, copyrighted ring. Should be genuine AFN-5013R-4 gold/platinum ring offered in the market.
P002	Nisguretsky Copyright Registration VAu 1-027-588 for AFN-5013R-4	Dep. Ex. 6; Ex. 2 (page 3 of 3)		
P003	Exclusive License Agreement	VERRAGIO 000519-521; Exhibit A sent by email		
P004	Photograph of AFN-5013R-4	Dep. Ex. 2 (page 2 of 3)	X	FRE 402, 403, 1002. Not relevant. Prejudicial. Not best evidence. Only copyrighted work is relevant.
P005	Photograph of AFN-5013R-4	Nisguretsky Dec., Ex. C	X	FRE 402, 403, 1002. Not relevant. Prejudicial. Not best evidence. Only copyrighted work is relevant. Photo is unclear.
P006	Design of AFN-5013R-4	VERRAGIO 000046		
P007	Facebook post	VERRAGIO 000056	X	FRE 402, 403, 602, 802, 901 Hearsay. Lack of foundation. Not relevant. Prejudicial.

Exhibit Number	Description	Prior ID/Bates Range	Objections	Basis for Objection
P008	Facebook posts	VERRAGIO 000516-518	X	FRE 402, 403, 602, 802, 901 Hearsay. Lack of foundation. Not relevant. Prejudicial.
P009	Most Popular Engagement Ring	Outlook version of KM-000018	X	Incomplete document.
P010	2016 Ring of the Year	VERRAGIO 000525	X	FRE 402, 403, 602, 802, 901 Hearsay. Lack of foundation. Not relevant. Prejudicial.
P011	Verragio expenditures on social media	VERRAGIO 000059	X	FRE 402, 403 Not relevant. Prejudicial.
P012	Verragio ranking on social media	VERRAGIO 000060	X	FRE 402, 403, 602, 802, 901 Not relevant. Prejudicial. Lack of foundation. Hearsay.
P013	Verragio sales of rings	VERRAGIO 000079-89	X	FRE 402, 403 Not relevant. Prejudicial.
P014	Accused Ring with ring stick, sticker and receipt	VERRAGIO 000057		
P015	Accused Ring with ring stick and sticker	Dep. Ex. 5		
P016	Accused Ring with ring stick, sticker and receipt	VERRAGIO 000058		
P017	Photograph of Accused Ring	Nisguretsky Dec. Ex. E		
P018	Comparison photographs of AFN-5013R-4 and Accused Ring	Nisguretsky Dec., Ex. F (revised last page to read Accused Ring instead of Accused Diamonds)	X	Photos inaccurate or doctored.
P019	Item Sheet for Item #356787K-8	KM-000001		
P020	PFS Ring Tower	KM-000002		

Exhibit Number	Description	Prior ID/Bates Range	Objections	Basis for Objection
P021	Email from Barbara August to Scott Kim and Lucy dated September 30, 2016	Outlook version of KM-000004-5, 18	X	Incomplete document.
P022	Emails in 2016 re The Most Popular Engagement Ring On Pinterest	KM-000021-23	X	Incomplete document.
P023	Walmart Shipments of Item # 356787	KM-000036-41		
P024	Email from Korey Reed to Julie Smith dated November 28, 2016	KM-000065-69	X	Incomplete document.
P025	Engagement & Bands	KM-000003		
P026	Verragio's Cease and Desist Letter sent to Walmart on June 11, 2018	KM-000070-81		
P027	Walmart's tender of defense to K&M dated July 10, 2018	KM-000082		
P028	Acceptance of Walmart's tender of defense to K&M dated July 11, 2018	KM-000083		
P029	Pay From Scan Schedule	WMT000165-168		
P030	Walmart website for Accused Ring	Dep. Ex. 41		
P031	Walmart website for Accused Ring	Dep. Ex. 42		
P032	Walmart website for Accused Ring	Dep. Ex. 43		

Exhibit Number	Description	Prior ID/Bates Range	Objections	Basis for Objection
P033	Nisguretsky Copyright Registration VA00001852563 for AFN-5013P	Verragio000526-527		
P034	CAD Design of AFN-5013P	Verragio000528	X	Late production: fact discovery closed on May 15, 2019 (ECF 26); FRE 402, 403, 602, 901 Lack of foundation. Not relevant. Prejudicial.
P035	CAD Design of AFN-5013R-4	Verragio000529	X	Late production: fact discovery closed on May 15, 2019 (ECF 26); FRE 402, 403, 602, 901 Lack of foundation. Not relevant. Prejudicial.
P036	Invoice for AFN-5013P-4	Verragio000530-531	X	Late production: fact discovery closed on May 15, 2019 (ECF 26); FRE 402, 403, 602, 802, 901 Lack of foundation. Not relevant. Prejudicial.
P037	Order Confirmation for AFN-5013P-4	Verragio000532	X	Late production: fact discovery closed on May 15, 2019 (ECF 26); FRE 402, 403, 602, 901 Lack of foundation. Not relevant. Prejudicial.
P038	Different shanks for Verragio Venetian Collection	Verragio000533-537	X	Late production: fact discovery closed on May 15, 2019 (ECF 26); FRE 402, 403, 602 , 901 Lack of foundation. Not relevant. Prejudicial.
P039	Verragio Trademark No. 2,063,519	Verragio000522	X	Plaintiff dropped its trademark claims on 8/14/2022; FRE 402, 403, Not relevant. Prejudicial.

Exhibit Number	Description	Prior ID/Bates Range	Objections	Basis for Objection
P040	Verragio Trademark No. 4,691,910	Verragio000523-524	X	Plaintiff dropped its trademark claims on 8/14/2022; FRE 402, 403, Not relevant. Prejudicial.
P041	Gold ring of AFN-5013R-4			
P0__	Any exhibits listed on Defendants' Exhibit List to which Plaintiff does not object			